

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:23-CV-897**

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates To:

Edward Raymond v. USA, 7:23-CV-546-M

**UNITED STATES' NOTICE OF
WITHDRAWAL OF MOTIONS
RELATED TO EDWARD RAYMOND**

Defendant United States of America hereby respectfully withdraws the following motions as to the ***Edward Raymond v. USA, 7:23-CV-546-M***, case due to an agreement to settle that case; the motions are still applicable to the other active cases:

- Motion to Exclude Plaintiffs' Phase II Bladder Cancer Experts Laura Plunkett, Steven Bird, Benjamin Hatten, Kathleen Gilbert, and Stephen Culp ("No Predicate Association Motion" Bladder Cancer) [D.E. 44 & 45];¹
- Motion to Exclude Plaintiffs' Phase II Bladder Cancer Experts Laura Plunkett, Steven Bird, Benjamin Hatten, Kathleen Gilbert, and Stephen Culp ("Literature Review Motion" Bladder Cancer) [D.E. 47 & 50];
- Motion to Exclude Plaintiffs' Phase III Bladder Cancer Experts for Performing Improper Differential Etiologies ("Improper Differential Motion" Bladder Cancer) [D.E. 51 & 52];
- Motion for Summary Judgment for Lack of Admissible Expert Testimony – Bladder Cancer [D.E. 48, 49]; and

¹ Each Motion was filed on the Master Docket, 7:23-cv-00897, and the individual docket in the *Raymond* case. The United States here provides the Docket Entry numbers for the Motions as filed on the individual docket in the *Raymond* case.

- Motion for Summary Judgment for Lack of Expert Testimony on But-For Causation [D.E. 53, 54].

Once the settlement has been finalized, *Edward Raymond v. USA*, 7:23-CV-546-M will be dismissed in due course.

Dated: November 6, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General,
Civil Division

JONATHAN D. GUYNN
Deputy Assistant Attorney General,
Torts Branch

BRIDGET BAILEY LIPSCOMB
Chief, Camp Lejeune Justice Act Section

ADAM BAIN
Special Litigation Counsel

MELANIE KONSTANTOPOULOS
MEGAN GADDY
MICHAEL CROMWELL
NANCY TINCH
Trial Attorneys

/s/ Haroon Anwar
HAROON ANWAR
Acting Assistant Director
United States Department of Justice
Civil Division, Torts Branch
Camp Lejeune Justice Act Section
1100 L Street, NW
Washington, DC 20005
202-598-3946
hroon.anwar@usdoj.gov

Attorney inquiries to DOJ regarding
CLJA: (202) 353-4426

*Attorneys for Defendant,
United States of America*

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2025, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ Haroon Anwar
HAROON ANWAR